

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

UNIVERSITAS EDUCATION, LLC,
Petitioner/Judgment Creditor
vs.
AVON CAPITAL, LLC,
Respondent/Judgment Debtor,
ASSET SERVICING GROUP, LLC,
Respondent, Garnishee,
SDM HOLDINGS, LLC,
Respondent/Garnishee,
and
AVON CAPITAL, LLC, a Wyoming Limited
Liability Company,
Intervenor.

Case No. 14-FJ-05-HE

PETITIONER'S MOTION FOR LEAVE TO FILE UNDER SEAL

Petitioner intends to file a confidential document as an exhibit in conjunction with its supplemental brief in support of its Motions for Sanctions against SDM Holdings, LLC (“SDM”). The proposed exhibits consists of payment records for counsel to a Judgment Debtor in the underlying litigation, and thus contains sensitive financial information of a non-party law firm. Petitioner accordingly brings this motion to file an exhibit under seal.

WHEREFORE, Petitioner respectfully requests that the Court permit Petitioner to file one exhibit under seal in conjunction with its forthcoming supplemental brief in support of its Motions for Sanctions against SDM.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of May 2021, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of Notice of Electronic Filing to the following ECF registrants on record:

John D. Stiner
Joseph H. Bocock
Alan Rupe
Gerald Green
Melvin McVay
Clayton Ketter
Jeffrey Sandberg

/s/ Timothy F. Campbell